

The State of Tennessee, Madison County  
Circuit Court

Leslie Ragan

vs.

Plaintiff

Lansing Building Products, Inc.

SUMMONS IN A CIVIL ACTION

No. C-07-274

**COPY**

Lansing Building Products, Inc.  
 Highest Ranking Official  
 169 Commerce Center Circle  
 Jackson, TN 38301

Defendant(s)

Address

To the above named defendant(s): Lansing Building Products, Inc.  
 You are hereby summoned and required to answer, in writing, the complaint which is herewith served  
 upon you, and to serve a copy of same upon Gilhart & Russell PLC,  
who is plaintiff's Attorney, whose address is 2021 Graystone Park, Jackson  
TN 38301, within thirty (30) days after service of this summons upon you, exclusive of the date of  
 service. If you fail to do so, a judgment by default will be taken against you for the relief demanded in the  
 complaint.

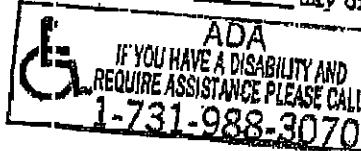
Issued this

22

day of

August

2007



By:

D. Volner

Deputy Clerk

RETURN ON SERVICE OF SUMMONS

I hereby certify and return, that on the 23 day of August, 2007, I served this  
 summons together with a copy of the complaint herein as follows:

Ken O' Dayal - Reg. Mgr.

*D. Volner*  
 Sheriff  
 Deputy Sheriff  
 Telles  
 #7745

08/28/2007 08:41 FAX 804 5272369

HRH-MID-MARKETING

006

FILED

IN THE CIRCUIT COURT FOR MADISON COUNTY TENNESSEE

JUDY BARNHILL, CIRCUIT COURT CLERK

AUG 22 2007

LESLIE RAGAN

Plaintiff,

COPY

DR  
DEPUTY CLERK

11:40 A.M. PM.

v.

NO C.07.274

LANSING BUILDING PRODUCTS, INC.

JURY DEMANDED

Defendant

DV I- Morgan

## COMPLAINT

COMES THE PLAINTIFF, LESLIE RAGAN, filing this Complaint against the Defendant, LANSING BUILDING PRODUCTS, INC. She shows:

PARTIES, JURISDICTION, AND VENUE

1. Leslie Ragan is a resident of Jackson, Tennessee.
2. The Defendant, Lansing Building Products, Inc., is a corporation which operates in Jackson, Tennessee and employed Plaintiff in Jackson, Tennessee.
3. Venue is proper in this Circuit Court as the Defendant operates in Madison County, employed Plaintiff in Madison County, and the operative facts occurred in Madison County.
4. This court has jurisdiction under the Tennessee Human Rights Act (THRA), Tenn. Code Ann. 4-21-101 et. seq.

FACTUAL BASES FOR SUIT

5. Defendant, through its regional manager, Ken Logue, harbored an animus against hiring a female such as Plaintiff where at least one female employee already exists in the same workplace

6. Defendant's attitude, through Logue, is that such women will wear their emotions on their sleeves, that hiring such women is a dangerous practice, that women can and will twist anything into sexual harassment, and that, unless the women is "butch and stocky," it is best not to hire a woman where it is possible to obtain a man.

7. Defendant's sales manager, Zack Farris, crossed Logue's discriminatory judgments and hired Plaintiff, a female, for the position of inside sales anyway.

8. Defendant, through Logue, said Plaintiff would wear her emotions on her sleeve, that she would twist things as women are prone to do, and that having two women in the same store was an unwise managerial decision.

9. Defendant, through Logue, said "one woman is enough" and that he would overrule Farris's decision to hire Plaintiff.

10. Defendant then "made a file" against Plaintiff to justify terminating her employment not long after her hire and acknowledged that Logue did not like Plaintiff's hire as a female and that Logue did not want any more women.

11. As a result of Defendant's decision, Plaintiff has lost wages, benefits and has suffered humiliation and embarrassment accompanying such a discriminatory discharge.

08/28/2007 08:42 FAX 804 5272369

HRH-MID-MARKETING

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CAUSES OF ACTION

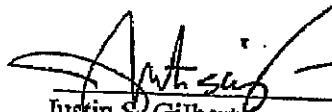
12. The foregoing facts are incorporated. Plaintiff brings the following causes of action:

A. Sex/Gender Discrimination Under Tennessee Human Rights Act;

13. Plaintiff seeks her lost wages (front and back pay), lost benefits, compensatory damages, attorneys fees, and costs along with injunctive relief to estop Defendant from making employment decisions based upon sex/gender.

14. Plaintiff demands a jury.

Respectfully submitted,



Justin S. Gilbert  
TN Bar No. 017079  
Michael L. Russell  
IN Bar No. 20268  
Gilbert & Russell, PLC  
2021 Greystone Dr.  
P. O. Box 11357  
Jackson, IN 38308  
Telephone: 731-664-1340  
Facsimile: 731-664-1540

ATTORNEYS FOR PLAINTIFF